Axelrod
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Your
Seattle
City Light

Randall W. Hardy, Superintendent
Charles Royer, Mayor

March 6, 1989

Wilder Construction Company, Inc.
2006 N. State Street
Bellingham, WA 98225

Gentlemen:

Underground Tanks - 1988 Program
Specification No. 2928

This letter rescinds the acceptance of the revised procedures for removal and handling of PCB-contaminated fluids and tanks, which you submitted to City Light by letter dated February 20, 1989.

As we agreed at our meeting held on March 1, 1989, we have compiled an acceptable procedure which incorporates the tank emptying and drum filling procedures prepared by Morris Environmental Services, dated February 5, 1989 with the revised procedures prepared by Morris Environmental Services, dated February 16, 1989.

This composite procedure together with the overview stated in your letter of February 20, 1989 comprise an acceptable plan, subject to all applicable provisions of Specification No. 2928.

A copy of the composite plan and your letter of February 20, 1989 are enclosed.

Yours truly,
Original Signed by
CHARLES J. WEEMS, P.E.
DIRECTOR, CONSTRUCTION ENGINEERING

Charles J. Weems, P.E.
Director, Construction Engineering

VC:kp

Enclosures

cc: Unit 822/Schwartz w/encl.
Summers/Wang w/encl.
Miller/Chu
Axelrod w/encl.
File

SCL 04178

CTY0049184

SEA289663

Original

UNDERGROUND TANKS
1988 PROGRAM
SPECIFICATION NO. 2928
February 6, 1989

Procedures for the removal of PCB-contaminated fluids and tanks, and preparation of these items for shipment to Envirosafe Services of Idaho, Inc.

Introduction

These procedures are a composite of the procedures prepared by Morris Environmental Services, dated February 5, 1989, and the revised procedures prepared by Morris Environmental Services, dated February 16, 1989. The Section entitled "Tank Emptying" from the procedures dated February 5, 1989 replaces the procedures dated February 16, 1989, and the Section entitled "Drum Filling" from the procedures dated February 5, 1989 are added to the procedures dated February 16, 1989.

This composite has been prepared by Seattle City Light as agreed to at the meeting held in the Construction Engineering Office at City Light on March 1, 1989.

Preparation

Prior to any of these operations, a Generator Waste Product Questionnaire (profile sheet) will be ~~prepared~~ initiated by the Contractor and completed by Seattle City Light and submitted to the treatment and disposal facility (Envirosafe Services of Idaho, Inc.).

Prior to the removal operation, Wilder Construction will ensure that Seattle City Light has notified the Washington Department of Ecology. Wilder Construction will also provide prior notification to the Seattle Fire Department and comply with the requirements of City Light Specification No. 2928, Section 02050, Subparagraph 3.04.

Tank Emptying

All access hole covers at the top of the tanks will be removed. A sheet of plastic will be placed around each hole to catch any dripping fluid.

A suction pump will be placed over each tank hole and a hose or pipe extended to the fluid surface. The discharge hose or pipe will extend to drums specified below.

As much free fluid as possible will be removed from each tank. When it is apparent that no further material can be pumped, the pump will be carefully removed from the tank, taking precautions to prevent spills of any residual fluid. Rubber gloves will be worn for handling of contaminated portions of the pump.

The pump will be carefully handled to prevent spills or contamination as it is moved between different tank ports.

When each tank has been emptied of free and/or pumpable fluid, any parts or plastic sheet will be removed from the tank. Any spill that contacted the tank or soil will be removed.

Floor Dri (TM) or an equivalent absorbent will be poured into the tank openings to capture any residual free fluids. The tank covers should then be replaced.

Drum Filling

Drums specified for the transportation of PCB-contaminated materials will be prepared by filling them about 30% full with Floor Dri (TM) or an equivalent absorbent material. The drums will be placed on a plastic sheet near the tanks to be emptied.

Fluid will be pumped to a drum until the fluid reaches the top of the absorbent material. The mixture will be stirred; more absorbent and fluid will be added and stirred until the drum is full.

After the pump is shut off, the discharge hose will be allowed to drain and then carefully moved to the next drum to be filled; rubber gloves will be used for handling the hose or any contaminated item. Any spill will be immediately wiped up.

If required, additional absorbent will be added to the filled drum prior to replacement of the lid.

Any spilled fluid will be removed from the outside of the drums.

Labels will then be applied to the drums.

Tank Removal

Wilder Construction will remove the tank, and comply with the requirements of City Light Specification No. 2928, Section 02050, Subparagraph 3.04. The tank should be lifted in such a manner that it is not mishandled or damaged, endangering the structural integrity of the tank.

When either tank is removed, the soil in the resultant cavity should be inspected to determine if a leak from the tank, or from spillage, had previously occurred. If necessary, sampling and analysis will be performed per City Light Specification No. 2928, Section 02050, Subparagraph 3.05.

The tank will then be labeled.

SCL 04180

Solid Waste

Any PCB-contaminated rags, clothing, used hose, etc., will be placed in a proper drum and included in the shipment of the tanks or contaminated oil.

Lifting/Loading

The tanks will be placed on plastic sheeting which can be drawn up to create a "diaper" to contain any leak that might occur during transportation. The truck to be utilized will have sideboards.

The tanks will be secured prior to departure from the scene. A Uniform Hazardous Waste Manifest will be prepared and signed by the generator (Seattle City Light). Proper placards will be placed on the vehicle(s).

The tanks, with sludge, will be transported for final processing at the Grandview, ID, facilities of Envirosafe Services of Idaho, Inc.

At their facility, Envirosafe Services will cut apart the tanks, remove the sludge, ensure that it is properly solidified, and dispose of it in their permitted lasndfill. The tanks will be also landfilled.

Safety and Health Precautions

Certain PCB mixtures have been identified as suspected human carcinogens. At the low concentrations present in the waste oils at City Light, the risk to workers is very slight. Nonetheless, exposure should be minimized. Heavy rubber gloves should be utilized when handling contaminated items (such as hoses); the gloves should not be used for any other purpose, including handling of noncontaminated items.

Protective clothing such as Tyvek (TM) suits will protect other clothing from contamination, but is optional to wear. Any clothing that does come in contact with PCB-contaminated oil will be disposed of as noted above.

Goggles are recommmended if there is a likelihood of splashing oil during pump-out or handling.

As should be done with any chemical handling, hands must be washed prior to eating or smoking when handling PCBs or solvents. Hands should also be washed prior to using rest room facilities.

General

No written procedure can anticipate every problem. Workers performing this task should be instructed to use common sense and to ask questions if there are any concerns.

Your Seattle City Light

Memorandum

SA

DATE : March 6, 1989

TO : Charles Weems

FROM : Shirli Axelrod Shirli Axelrod

SUBJECT : Handling PCB at Georgetown--February 2, 1989 letter to Wilder Construction from Construction Engineering

As we have discussed, the proposed procedure for handling PCB, submitted by Wilder and its subcontractor G L in Wilder's letter of February 20 is not acceptable to EAD. EAD had not been informed about its contents nor given a copy to review. Therefore, I have asked you to inform Wilder the procedure is not acceptable, contrary to your February 23 letter.

The disposition of materials containing PCBs as described by Wilder and G L's procedure is the major problem. Because of liability concerns, SCL's liquids over 1 ppm PCB are handled and disposed of as a PCB-contaminated orchamically detoxified waste. Disposal by landfilling at the Envirosafe Hazardous Waste Landfill in Idaho meets this requirement. Disposal to Fuel Processors for combustion at an unspecified facility does not meet this requirement.

I have met with your field staff and the contractors to work out an acceptable procedure, which I will confirm in a separate memo to you.

I would like to recap the outcome of our meeting of March 1, regarding procedure to prevent this type of problem recurring. You have told us Construction Engineering will transmit to EAD for approval any communications involving PCB or other environmental concerns in projects you division administers. Thank you for your prompt response in that meeting.

SA:bal

cc: Best
Axelrod
EAD 772
File

SCL 04183

525-L (7-82)

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